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*Attorneys for Mark D. Waldron, Ch. 7 Trustee*

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF WASHINGTON**

In re: Case No. 18-03197 FPC 11

GIGA WATT, Inc., a Washington  
corporation, Chapter 7

Debtor.

**NOTICE OF (I) TRUSTEE'S MOTION  
FOR AUTHORITY TO INCUR AND  
PAY EXPENSES INCIDENT TO  
DISCOVERY IN PERKINS  
ADVERSARY AND (II) HEARING  
THEREON**

**Telephonic Hearing**

Date: May 3, 2022

Time: 10:30 a.m. PT

Telephone: (509) 353-3183

**PLEASE TAKE NOTICE THAT** Mark D. Waldron, as Trustee  
("Trustee") has filed the *Trustee's Motion for Authority to Incur and Pay  
Expenses Incident to Discovery in Perkins Adversary* (the "Motion"), dated April  
20, 2022, ECF 946. The Motion and supporting papers may be obtained from the  
Court's clerk. A telephonic hearing (the "Telephonic Hearing") will be held on the  
Motion on May 3, 2022, at 10:30 a.m., Pacific Time. The call-in information is set  
forth in the caption of this Notice. Pursuant to the Court's oral ruling on April 20,

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Notice of (i) Trustee's Mot. for Auth, to Incur  
Discovery Exp. in Perkins Adversary, etc. - Page 1

2022, if you wish to object to the Motion, you must file an **Objection** with the Court and serve it upon undersigned counsel on or before **April 29, 2022**. The Telephonic Hearing will be held even if no objection is timely filed and served. However, untimely objections may not be considered without the Court's permission.

By the Motion the Trustee is seeking authority to incur and pay the following expenses incident to discovery in the Perkins Adversary:

	Comments	Subtotal	Total
<b>Incurred Deposition Expense – Timur Usmanov</b>	Transcript:	\$1,925.75	<b>\$4,507.00</b>
	Video:	\$1,737.50	
	One half the cost of the interpreter; Perkins Coie LLP (“Perkins”) has agreed to pay the other half.	\$843.75	
<b>Anticipated Deposition Expenses</b>	<u>1. Timur Usmanov (cont'd) – Giga Watt CFO from 1/1/2017 to 8/15/2017 (circa)</u>	\$1,000.00	
	<u>2. David Carlson, Giga Watt's CEO from 1/1/2017 to 8/15/2017 (circa)</u>	\$2,500.00	
	<u>3. Mike Olmstead, a governor of Giga Watt who worked in the accounting department</u>	\$2,500.00	
	<u>4. Jeff Field – actively involved in construction of new facilities for WTT tokens</u>	\$2,500.00	
	<u>5. Travis Hibbard, principal of LT Equities LLC and Talos Construction, Inc. – who built the Giga Pods.</u>	\$2,500.00	
	<u>6. Katrina Arden – attorney for Giga Watt, Inc. before and during GW ICO (introduced the escrow concept to the GW ICO)</u>	\$2,500.00	

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	Comments	Subtotal	Total
	7. Lowell Ness – attorney at Perkins Coie overseeing escrow	\$2,500.00	<b>\$16,000.00</b>
<b>E-Disc. Processing</b>	Lighthouse, extraction, and processing as described in Section III hereof	\$9,600.00	<b>\$9,600.00</b>
<b>Misc.</b>	Circle, Intuit, and LT Equities, reasonable subpoena expense	\$2,000.00	<b>\$2,000.00</b>
			<b>\$32,107.00</b>

Dated: April 22, 2022

POTOMAC LAW GROUP PLLC

By: /s/ Pamela M. Egan  
Pamela M. Egan (WSBA No. 54736)

*Attorneys for Mark D. Waldron, Chapter 7 Trustee*

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